UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

SUBJECT:	CLEAN AIR ACT INSPECTION REPORT MJ Celco, Inc, Schiller Park, IL 60176
FROM:	Karina Kuc, Environmental Engineer AECAB (IL/IN)
THRU:	Nathan Frank, Section Supervisor AECAB (IL/IN)
TO:	File

BASIC INFORMATION

Facility Name: MJ Celco, Inc.

Facility Location: 3900 Wesley Terrace, Schiller Park, IL 60176

Date of Inspection: July 20, 2022

EPA Inspector(s):
1. Karina Kuc, Environmental Engineer
2. Tess Russell, Environmental Engineer

Other Attendees:
1. Don Mayo, Director of Quality and Continuous Improvement, MJ Celco
2. Stan, Degreaser Operator, MJ Celco

Contact Email Address: DMayo@mjcelco.com

Purpose of Inspection: to assess compliance with the Clean Air Act and the facility's Clean Air Act Permit Program (CAAPP) Permit 95120223

Facility Type: contract metal stamping facility with a batch vapor degreaser

Regulations Central to Inspection: 40 CFR 63 Subpart T, the National Emission Standards for Halogenated Solvent Cleaning applies to the batch vapor degreaser

Arrival Time: 10:30 AM
Departure Time: 11:35 AM

Inspection Type:

☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

☒ Presented Credentials
☒ Stated authority and purpose of inspection
☒ Provided Small Business Resource Information Sheet
☐ Small Business Resource Information Sheet not provided.
☒ Provided CBI warning to facility

The following information was obtained verbally from Don Mayo unless otherwise noted.

Process Description: The facility forms metal by stamping, grinding and secondary forming, as well as light assembly. Raw material consists of sheet metal or coil, most commonly, cold rolled steel, high-strength low-alloy (HSLA) steel, and hot dipped galvanized steel. The metal is processed through various machines to client specification. Two lubricants are used, a water-soluble oil based and a petroleum-based stamping oil. The facility performs tungsten inert gas (TIG), metal inert gas (MIG) welding, and resistance spot welding. Parts that will be welded are degreased in the batch vapor degreaser prior to welding, which is currently about 45% of total parts. The degreaser has a wire basket with two hoists. The facility also utilizes an aqueous washing system.

Staff Interview: All painting and metal finishing is outsourced. Degreaser use is gradually decreasing. The facility has a preventative maintenance program for the degreaser which includes monthly maintenance. Records for the degreaser include measuring speed of the hoist, windspeed, and solids removed on a monthly basis; temperatures of superheated vapor zone on a weekly basis; and pH test conducted on a daily basis. Subpart T and the facility's CAAPP permit requires monitoring and recording the hoist speed on a monthly basis; wind speed on a quarterly basis; temperature of the superheated vapor zone and room parameters established during the initial compliance test on a weekly basis. The degreaser catches some vapors to be condensed and reused in the degreaser; otherwise the degreaser is vented continuously through a stack to the roof with no air pollution control devices. According to Subpart T, degreasers shall have a primary condenser.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations: At the batch vapor degreaser, EPA observed three 5-gallon buckets with no lids, containing a clear liquid. EPA asked the degreaser operator what was in the buckets. He stated that they use a pump and hose to add trichloroethylene (TCE) to the degreaser. When they are done refilling, excess TCE that remains in the hose is emptied into the

buckets. EPA observed a small glass bottle with no lid, placed near the degreaser records. EPA asked the degreaser operator what was in the bottle. The degreaser operator stated that the bottle contained a sample of TCE grabbed from the degreaser for the pH test. According to Subpart T and the facility's CAAPP permit, waste solvent should be stored in closed containers.

The degreaser is mechanically opened. EPA observed the equipment's safety switches and postings on the degreaser dictating batch completion times. Subpart T and the facility's CAAPP permit require a permanent conspicuous label summarizing operation procedures to be affixed to the degreaser.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Clean Air Act Permit Program (CAAPP) application
- 2019 to 2021 emissions tracking including submittal to IEPA and TCE purchase and disposal records
- Follow-up on the concerns we saw (uncovered 5-gallon buckets with TCE, opened sampling bottle full of TCE left out)
- Any degreaser operation Standard Operating Procedures (SOPs) or work protocols
- The record of the last inspection of the degreaser
- Any air-related industrial hygiene study

Compliance Assistance: EPA advised that when placing parts in the degreaser, they should be arranged in such a way as to minimize pooling. Work practices should be displayed on the degreaser.

Concerns: EPA observed three, uncovered 5-gallon buckets, which the degreaser operator stated were filled with TCE drained from the hose. EPA observed an open glass bottle, which the degreaser operator stated was filled with TCE from the degreaser for sampling purposes.

DIGITAL SIGNATURES

Report Author: KARINA KUC Digitally signed by KARINA KUC Date: 2022.09.15 10:45:30 -05'00'

Section Supervisor: Frank, Nathan Digitally signed by Frank, Nathan Date: 2022.09.19 16:28:36 -05'00'

APPENDICES AND ATTACHMENTS

Appendix A: Digital Image Log

Facility Name: MJ Celco, Inc.
Facility Location: 3900 Wesley Terrace, Schiller Park, IL 60176
Date of Inspection: July 20, 2022

APPENDIX A: DIGITAL IMAGE LOG

1. **Inspector Name:** Karina Kuc	2. **Archival Record Location:** Region 5 ERC

Image Number	File Name	Date and Time (incl. time zone and DST)	Latitude and Longitude	Description of Image
1	IMG-1855.jpg	2022:07:20 11:12:06	41.949392, -87.863389	control panel for degreaser and posted signage
2	IMG-1856.jpg	2022:07:20 11:12:13	41.949494, -87.863394	control panel for degreaser
3	IMG-1857.jpg	2022:07:20 11:13:52	41.949383, -87.863486	temperature records for degreaser
4	IMG-1858.jpg	2022:07:20 11:13:53	41.949383, -87.863486	temperature records for degreaser
5	IMG-1859.jpg	2022:07:20 11:15:43	41.949433, -87.863464	checklist for degreaser
6	IMG-1860.jpg	2022:07:20 11:26:07	41.949383, -87.863486	four uncovered buckets near degreaser
7	IMG-1861.jpg	2022:07:20 11:26:11	41.949383, -87.863486	three uncovered buckets containing liquid near degreaser
8	IMG-1862.jpg	2022:07:20 11:27:57	41.949383, -87.863486	specifications of boiler